

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

KENNY HILL,

PLAINTIFF

Civil Action No. 05-160E

v.

DECLARATION OF JOYCE HORIKAWA,
SENIOR LITIGATION COUNSEL

JOHN LAMANNA, ET AL.,
DEFENDANTS

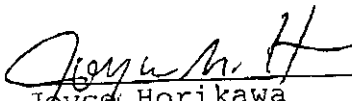
I, Joyce Horikawa, do declare and state as follows:

1. I am an Attorney employed by the United States Department of Justice, Federal Bureau of Prisons (BOP), and assigned to the Northeast Regional Office (NERO) in Philadelphia, Pennsylvania. I am licensed to practice law in the States of Pennsylvania and New Jersey. I began my service with the BOP on September 20, 1993.
2. I am aware that inmate Kenny Hill, Register Number 17110-016, has filed the above referenced lawsuit, in which he alleges staff violated his Constitutional Rights, and negligently exposed him to unsafe conditions in the UNICOR factory at FCI McKean.
3. As an attorney in NERO, I have access to the computerized database, in which all of the administrative tort claims filed are maintained and tracked. On or around August 17, 2006, I conducted a search of all administrative tort claims filed in fiscal years 2000-2006. I conducted this search by

reviewing the computerized database which indexes all administrative tort claims filed by inmates in the Northeast Region. FCI McKean is located in the Northeast Region.

4. This search revealed that since 2000, inmate Hill has filed no Administrative Tort Claims. Specifically, he has filed no administrative tort claims relating to the conditions of the UNICOR factory in FCI McKean.

I declare under penalty of perjury in accordance with the provisions of 28 U.S.C. § 1746 that the above is accurate to the best of my knowledge and belief.



Joyce Horikawa
Senior Litigation Counsel
Northeast Regional Office

Sept. 11, 2006
Date